

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILLIAM T. DIVANE, JR.,
as the ELECTRICAL INSURANCE
TRUSTEES,

Plaintiffs,

v.

DELECTRIC SHOP, INC.,

Defendant.

No. 07 C 6205

Judge Dow

MOTION FOR DEFAULT JUDGMENT

The plaintiffs, WILLIAM T. DIVANE, JR., et al., as the ELECTRICAL INSURANCE TRUSTEES, by their attorney, David R. Shannon, and pursuant to Fed. R. Civ. P. 55, request the Court to enter a default judgment against the defendant, DELECTRIC SHOP, INC. In support of their motion, the Trustees state:

1. The Trustees filed suit on November 2, 2007. DELECTRIC SHOP, INC. was served with summons and complaint on November 20, 2007.

2. To date the defendant has failed to file an appearance or answer to the complaint.

3. The affidavit of Mark Cavanagh, the Trustees' Collection Coordinator, is attached hereto as Exhibit A.

WHEREFORE, William T. Divane, Jr., et al., as the Electrical Insurance Trustees request the entry of default against judgment against DELECTRIC SHOP, INC. in the amount of \$103,739.44. The Trustees also request the entry of an order enjoining DELECTRIC SHOP, INC. from continuing to engage in work within the scope of

work clause in the Principal Agreement and within the jurisdiction of Local 134, I.B.E.W., for so long as it is a signatory of that agreement, unless and until it furnishes the Trustees with a duly-executed standard fringe-benefit bond.

WILLIAM T. DIVANE JR., et al., as the
ELECTRICAL INSURANCE TRUSTEES

/s/ David R. Shannon
By: _____
One of Their Attorneys

David R. Shannon
Tenney & Bentley, L.L.C.
111 West Washington Street, Suite 1900
Chicago, Illinois 60602
(312) 407-7800